

May 6, 2004

Richard Sprott, Director
Division of Air Quality
Department of Environmental Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820

Attention: Harold Burge, Compliance Section

Dear Director Sprott,

Proposed Stack Test Protocol for Intermountain Generating Station

The Intermountain Power Service Corporation (IPSC) is submitting for your approval the attached testing protocol for determining carbon monoxide (CO) emissions from the Unit 2 boiler at the Intermountain Generating Station (IGS) in Delta, Utah. This testing is required by both the current Approval Order (AO) DAQE-AN0327009-04 and Title V Operating Permit #2700010002.

The purpose of this test is to verify that IGS Unit 2 CO emissions correlate to boiler excess oxygen in similar fashion to the CO/O₂ relationship in IGS Unit 1. The test is not to be used to determine compliance. Testing performed on IGS Unit 1 showed a strong correlation between CO emissions and boiler excess oxygen. This correlation allows the use of parametric data (O₂ at certain operating conditions) to accurately calculate CO emissions. This methodology is appropriate and useful since CO is not monitored any other way.

The testing protocol is straight-forward in that reference methods shall be used for stack emission determinations. Online instrumentation shall be used for boiler conditions. One exception to protocol is in Reference Method 10, where IPSC proposes to use Reference Method 3A continuous sampling as opposed to Reference Method 3 integrated sampling, and asks your approval to do so accordingly.

IPSC is proposing to test June 8, 9, and 10, 2004.

Test data and evaluations shall be submitted to the attention of Harold Burge of your Compliance Section in a final report within 30 days of testing.

If you have any questions or clarifications, please contact Mr. Dennis Killian, Superintendent of technical Services and (435) 864-4414, or dennis-k@ipsc.com.

In as much as this notice of intent may affect our Title V Operating Permit, I hereby certify that,

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based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Cordially,

George Cross
President, Chief Operations Officer, and Title V Responsible Official

BP/RJC/jj

Enclosure: CO Test Protocol at IGS
cc: Blaine Ipson, IPSC

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